

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED v. FORTINET, INC.	Case No. 2:22-cv-00322-JRG-RSP (Lead Case) JURY TRIAL DEMANDED
LIONRA TECHNOLOGIES LIMITED v. CISCO SYSTEMS, INC.	Case No. 2:22-cv-00305-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LIMITED v. HEWLETT PACKARD ENTERPRISE COMPANY, ET AL.	Case No. 2:22-cv-00319-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LIMITED v. PALO ALTO NETWORKS, INC.	Case No. 2:22-cv-00334-JRG-RSP (Member Case)

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO TRANSFER VENUE AND FOR LEAVE
TO TAKE VENUE-RELATED DISCOVERY**

Plaintiff Lionra Technologies Limited (“Lionra”) and Defendant Fortinet, Inc. (collectively, “Fortinet”) file this Joint Motion for Extension of Time to Respond to Defendant’s Motion to Transfer Venue and for Leave to Take Venue-Related Discovery. This Motion is based on the following facts:

1. Fortinet seeks to transfer this case to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1404(a). Dkt. No. 81.

2. Lionra's response to the Motion to Transfer is presently due February 21, 2023.

3. Having conferred, the Parties have agreed, subject to the Court's approval, to extend the time for Lionra to respond to Fortinet's Motion to Transfer until March 24, 2023, for Fortinet to file a reply brief to March 31, 2023, and for Lionra to file a sur-reply until April 7, 2023, so that the Parties may conduct discovery on venue-related issues relevant to Fortinet's Motion to Transfer.

4. The Parties have further agreed that any depositions taken by either side will be limited to venue-related topics, and that should a Party seek a second deposition of any witness, including a Rule 30(b)(6) witness, relating to issues other than venue issues during fact discovery, the Parties will not object to such a second deposition on the basis that the deponent has already been deposed in connection with venue discovery in this case.

5. The Parties have agreed to limit each side's venue discovery to 5 interrogatories, 10 requests for production, and 4 hours of deposition testimony. The venue discovery period shall open on February 9, 2023 and end on March 17, 2023.

6. Lionra has agreed not to argue that the delay resulting from this extension of time supports its opposition to Fortinet's Motion to Transfer.

7. Accordingly, good cause exists for the Parties' requested extension of time for purposes of taking venue discovery. The Parties seek the requested relief not for the purpose of delay, but in the interests of justice.

WHEREFORE Plaintiff Lionra Technologies Limited and Defendant Fortinet respectfully seek an Order extending the time for Lionra to respond to Fortinet's Motion to Transfer until March

24, 2023, for Fortinet to file a reply brief to March 31, 2023, and for Lionra to file a sur-reply until April 7, 2023, for purposes of allowing the Parties to conduct venue-related discovery.

A proposed order is submitted herewith.

Dated: February 8, 2023

Respectfully submitted,

By: /s/ Brett Cooper

Brett E. Cooper (NY SBN 4011011)
bcooper@bc-lawgroup.com
Seth Hasenour (TX SBN 24059910)
shasenour@bc-lawgroup.com
Jonathan Yim (TX SBN 24066317)
jyim@bc-lawgroup.com
Drew B. Hollander (NY SBN 5378096)
dhollander@bc-lawgroup.com

BC LAW GROUP, P.C.

200 Madison Avenue, 24th Floor
New York, NY 10016
Telephone: (212) 951-0100

*Attorneys for Plaintiff Lionra Technologies
Limited*

By: /s/ Alice E. Snedeker

Melissa R. Smith
State Bar No. 24001351
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Matthew C. Gaudet
mcgaudet@duanemorris.com
Alice E. Snedeker
aesnedeker@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree NE, Suite 1700
Atlanta, GA 30309

Telephone: 404.253.6900
Facsimile: 404.253.6901

Counsel for Defendant Fortinet, Inc.

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record on February 8, 2023 via electronic service.

/s/ Brett Cooper

Brett E. Cooper

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on February 6, 2023, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett E. Cooper

Brett Cooper